

O3b Limited
900 17th Street NW
Suite 300
Washington DC 20006

www.o3bnetworks.com



October 15, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Re: Use of Spectrum Bands Above 24 GHz For Mobile Radio Services; Petition for Rulemaking of the Fixed Wireless Communications Coalition to Create Service Rules for the 42-43.5 GHz Band; GN Docket No. 14-177 and RM-11664

Dear Ms. Dortch:

O3b Limited hereby submits this *ex parte* letter regarding the above listed proceeding.¹ O3b's 12-satellite non-geostationary satellite constellation operates in spectrum identified in the Spectrum Frontiers NOI for potential 5G deployment, both domestically and abroad. On October 14, 2015 the undersigned and Will Lewis of O3b Networks met with Louis Peraetz of Commissioner Clyburn's office to discuss the above captioned proceeding.

Specifically, as identified below, O3b discussed the services enabled via operation of its constellation in its first year of service including:

- O3b is already the leading satellite provider of capacity in the Pacific, providing 5 Gbps of capacity to the Pacific Islands,² including U.S. territories.³
- The U.S. Navy recently engaged the O3b system for a Limited Objective Experiment designed to identify new and innovative technologies, which will

¹ See *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services; Amendment of the Commission's Rules Regarding the 37.0-38.6 GHz and 38.6-40.00 GHz Bands; Implementation of Section 309(j) of the Communications Act—Competitive Bidding, 37.0-38.6 GHz and 38.6- 40.0 GHz Bands; Petition for Rulemaking of the Fixed Wireless Communications Coalition to Create Service Rules for the 42-43.5 GHz Band*, Notice of Inquiry, 29 FCC Rcd 13020 (2014) ("Spectrum Frontiers NOI").

² Total capacity contracted in the Pacific now 5Gbps, <http://www.o3bnetworks.com/total-capacity-contracted-in-the-pacific-now-5gbps/> (last accessed October 14, 2015).

³ Caleb Henry, *O3b Sees Contract Surge, Targets New Markets*, June 19, 2015, available at <http://www.satellitetoday.com/telecom/2015/06/19/o3b-sees-contract-surge-targets-new-markets/>.

enable more effective naval operational capabilities.⁴ O3b delivered 600 Mbps (200 Mbps of uplink, 400 Mbps of downlink) of capacity to the U.S.S. Fort Worth while it was at sea.

- Royal Caribbean Cruise Lines uses O3b capacity to provide high speed internet connectivity to its passengers and crew.⁵ Royal Caribbean continues to expand the number of ships in its fleet with the O3b service, and each of those ships have more bandwidth individually than the rest of the cruise industry combined.⁶
- O3b has enabled the deployment of 3G⁷ and 4G⁸ services to previously underserved and unserved populations.

Please direct any questions to the undersigned.

Sincerely,

/s/ Suzanne Malloy

Suzanne Malloy

Vice-President, Regulatory Affairs

O3b Limited

Suzanne.malloy@o3bnetworks.com

202-813-4026

⁴ O3b Networks Successfully Participates in U.S. 7th Fleet Trident Warrior 2015 Exercises, <http://www.o3bnetworks.com/o3b-networks-successfully-participates-in-u-s-7th-fleet-trident-warrior-2015-exercises/> (last accessed October 14, 2015).

⁵ Some Royal Caribbean ships served by O3b can accommodate up to 8800 passengers and crew. *See* "Allure of the Seas Ship Fact Sheet," <http://www.royalcaribbeanpresscenter.com/fact-sheet/20/allure-of-the-seas/> (last accessed October 14, 2015).

⁶ O3b Connects Royal Caribbean "Smart Ship" Anthem of the Seas in the Mediterranean, <https://www.o3bnetworks.com/o3b-connects-royal-caribbean-smart-ship-anthem-of-the-seas-in-the-mediterranean/> (last accessed October 14, 2015).

⁷ Kate Nesbitt, *O3b Constellation Lets Digicel Meet Explosive Demand in Papua New Guinea*, June 15, 2015, available at <http://www.prweb.com/releases/2015/06/prweb12787799.htm>.

⁸ Skynet Goes Live on O3b Networks Delivering High Speed Broadband Services to Rural Colombia, September 2, 2015, <http://www.marketwatch.com/story/skynet-goes-live-on-o3b-networks-delivering-high-speed-broadband-services-to-rural-colombia-2015-09-02> (last accessed October 14, 2015).